

IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF ARKANSAS

In re:: Billy G. Scallorn
Debtor

Case No.: 3:22-bk-70129
Chapter 13

MOTION TO EXTEND THE AUTOMATIC STAY

COMES NOW Billy G. Scallorn ("Debtor"), by and through his attorney, Matthew D. Mentgen, and for this Motion to Extend the Automatic Stay, states:

1. Debtor filed the instant cause of action. This is a core proceeding.4:20-bk-11088
2. Debtor was a debtor in bankruptcy case 3:21-bk-71598 filed in the Western District of Arkansas on November 11, 2021. This case was dismissed on January 18, 2022 for failure to Timely Pay Filing Fee. Consequently, 11 U.S.C. 362(c)(3)(A) applies and the automatic stay will terminate with respect to the Debtors on the 30th day after the filing of this case.
3. To facilitate an orderly and successful reorganization, Debtors seek an extension of the automatic stay as to all creditors until Debtors receive a discharge or this Court orders otherwise.
4. Debtors' previous case was dismissed due to failure to pay filing fee. Debtor has had a difficult time gathering the required documentation to complete his schedules and plan due to many of the records being in his ex-wife's possession. Additionally, Debtor's home burned in December 2021 destroying additional documentation. Further, during this time Debtor was unclear on the timeline to pay his filing fee.
5. Debtor has worked hard to gather and restore the required documentation necessary to complete his bankruptcy schedules and will be submitting them shortly to the court. Further, Debtor's business income and asset sales will be sufficient to make the required payments to the trustee. Further, Debtor will be paying his filing fee in full by March 15, 2022. Therefore, Debtor is likely to successfully complete this Chapter 13 reorganization.

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Further, Debtor's business income and asset sales will be sufficient to make the required payments to the trustee. Further, Debtor will be paying his filing fee in full by March 15, 2022. Therefore, Debtor is likely to successfully complete this Chapter 13 reorganization.

WHEREFORE, Debtor Billy G. Scallorn prays that this Court grant his Motion to Extend the Automatic Stay to all creditors.

Respectfully submitted,

/s/ Matthew D. Mentgen
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